

# COMPLAINT

(for non-prisoner filers without lawyers)

U.S. DISTRICT COURT  
EASTERN DISTRICT - WI

FILED

2021 JUN 5 A 9:04

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

(Full name of plaintiff(s))

Julie Valadez

v.

Case Number:

(Full name of defendant(s))

Waukesha County Circuit Court  
Judge Michael J. Abrahamian  
Molly J. Jasmer

(to be supplied by Clerk of Court)

## A. PARTIES

1. Plaintiff is a citizen of Wisconsin and resides at  
(State)

WI DOJ Safe at Home 3902 Milwaukee St #5400  
(Address) PO Box 7188, Madison WI 53707

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant Waukesha County Courthouse  
Judge Michael J. Abrahamian (Name)  
Molly Jasmer (see attachment Appendix)

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Defendants:  
Waukesha County Courthouse  
515 W Moreland Blvd  
Waukesha WI 53188

Michael J. Aprahamian  
Waukesha County Circuit Court Judge  
Branch 9 Court Room C263  
515 W. Moreland Blvd  
Waukesha WI 53188

Molly J. Jasmer  
Grady & Hayes & Neary LLC  
N14 W23797 Stone Ridge Dr.  
Suite 200  
Waukesha WI 53188

Guardian ad Litem Waukesha County Courthouse

is (if a person or private corporation) a citizen of \_\_\_\_\_  
(State, if known)

and (if a person) resides at \_\_\_\_\_  
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for \_\_\_\_\_  
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.) (see Attachment)  
Appendix I

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

Emergency  
Claim - Injunctive Relief for:  
Complaint - wrongful & unlawful <sup>civil</sup> order prohibiting contact with my own son.  
On March 18, 2021 Judge Michael J. Aprahamian summoned me to attend an Order to Show Cause hearing which he did not have legal authority to do, an order to show cause that he motioned to himself on an order he wrote for me not to be able to contact him while still presiding over the family law case 18FA296 which had closed and was/is on appeal 20AP1006 (taken by DV Leap - Domestic Violence Legal Empowerment Appellate project as my case is against a domestic abuser Ricardo Valadez.)



and motion to remove my lawful placement with my son without a motion or allegation  
He appointed ~~who he appointed~~ Molly Jarmer on Sept 28, 2020 to defend his final ruling or hearing scheduled.

in the appeal and ~~who~~ <sup>she</sup> delayed the appeal, ~~caused~~ the contact with the judge to begin with when she wrongfully obtained the ~~appeal~~ appellate transcripts and the court administrator Michael Niemon continued to direct me to contact the judge regarding the invoice I was requesting from the court reporter, and Molly also motioned to file a joint response brief with the domestic abuser (having not met any of us as she was not the GAL on the case Katherine DeLorezo was but was referred criminal charges where I am the victim for violating the Wisconsin Department of Justice Safe at Home Program by knowingly giving away my ~~and~~ actual location) the day before on March 17, 2021. My son was being treated in a mental health outpatient program at the time for PTSD from the abuse with his father and he stated his fear of his father and his fear his father would take him from his mother as he repeatedly stated.

This traumatized my son and he has been in critical condition to this day asking to be returned to his mother who he is unlawfully being kept from as he feared. On April 7, 2021 the police were dispatched to my son screaming for help. He was hospitalized for suicidal ideation asking for his mother and not to be with his father. On April 8 2021 Molly Jasmer illegally told the hospital not to allow any contact with his mother. She then wrote up a document "Prohibiting Contact" and based it unlawfully on her authority as a chapter 767 GAL and presented it to the hospital to enforce without a Judge's signature. There is a police report from this incident. Judge Apra hamian, again without a hearing, signed the unlawful civil order on April 13, 2021 with a filing date and signature date of April 13, 2021 in violation of federally protected parental rights to ~~own~~<sup>ones</sup> own child. There is no criminal allegation and no restraining order. This order is unlawful and requires injunctive relief for myself and my son to preserve and protect our federal + constitutional rights.

If this is not addressed by the federal court there will continue to be irreparable harm and my son is now high risk suicidal after his third hospitalization since this wrongfully happened to him on March 18, 2021 and April 13, 2021, he is 13 years old and entitled to express his fears and requests honored.

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$ \_\_\_\_\_.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

Injunctive Relief of the unlawful orders entered April 13, 2021, in Waukesha County Family Court submitted by Molly Jarmer after committing a crime of presenting it as enforceable without a hearing notice and most importantly a judge's signature. And award, if possible, of damages caused.

E. JURY DEMAND

I want a jury to hear my case.

☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 25 day of June 2021.

Respectfully Submitted,

Julie Valadez  
Signature of Plaintiff

262-745-3125  
Plaintiff's Telephone Number

julie.c.valadez@gmail.com  
Plaintiff's Email Address

WI DOJ Safe at Home Program  
3902 Milwaukee St. #5400 PO Box 7188

Madison WI 53707  
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE**



I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Filing Fee form and have attached it to the complaint.



I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.